## Exhibit 4

**Certificate of Service** 

## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2014, I electronically filed the Motion of the City of Detroit for Entry of Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 Approving Claim Objection Procedures (the "Motion"), with the Clerk of the Court which sends notice by operation of the court's electronic filing service to all ECF participants registered to receive notice in this case. The City has engaged a Noticing Agent, which will serve this Motion on the Master Service List and file a subsequent Proof of Service after it has performed the service.

Dated: June 10, 2014

FOLEY & LARDNER LLP

By: /s/ Tamar N. Dolcourt
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